

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ACCURIDE ERIE L.P., a limited
partnership,

Case No, 05-CV-169 Erie

Plaintiff/Counterclaim Defendant,

Judge Sean J. McLaughlin

v.

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE &
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA, LOCAL UNION 1186,
a voluntary unincorporated association,

JOINT MOTION TO AMEND PRETRIAL SCHEDULE

AND NOW, comes the Plaintiff, Accuride Erie, L.P., by and through its attorneys, Ryley Carlock and Applewhite, and Quinn Buseck Leemhuis Toohey & Kroto, Inc., and the Defendants, International Union, United Automobile, Aerospace & Agricultural Implement Workers of America, Local Union 1186 (the “Local”) and Counterclaim Plaintiff International Union, United Automobile, Aerospace & Agricultural Implement Workers of America (the “UAW”), hereinafter jointly referred to as the “Union Entities,” through their attorneys, Catherine J. Trafton, Esquire and William T. Payne, Esquire and together submit the following Joint Motion to Amend Pretrial Schedule.

1. Pleadings in this matter are closed.
2. Discovery in this matter is closed.
3. The Court had previously set February 6, 2006 as the deadline for Plaintiff to file its Motion for Summary Judgment.

4. The Plaintiff has requested an extension of time until February 10, 2006, in which to do so, Defendants have consented to this request, provided that such extension of time not shorten any response period to which they might be entitled.

5. Accordingly the parties agreed to seek a further enlargement of the pre-trial schedule from this Honorable Court.

6. This is a joint motion. No party will be prejudiced by this amendment.

7. Therefore, it is respectfully requested that this Honorable Court amend the pre-trial schedule as follows

- a. Plaintiff's Motion for Summary Judgment and Supporting Brief shall be filed by February 10, 2006;
- b. Defendants' Response and any Cross-Motion for Summary Judgment and Supporting Brief shall be filed by March 13, 2006;
- c. Plaintiff's reply brief shall be due on March 31, 2006.

WHEREFORE, the parties respectfully and jointly request that this Honorable Court grant the instant motion.

Respectfully submitted,

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